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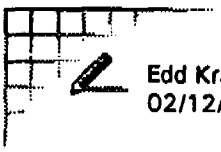

Edd Kray
02/12/98 11:13 AM

To: Marcella Broussard@CCM
cc: chris.gilbreath@state.co.us, steve.tarlton@state.co.us
Subject: 886 IM/IRA Comments

Marla,

As requested here are comments on the latest version of the draft 886 IM/IRA.:

1. General comment: On p.1 you discuss the ISM process of defining the work, analyzing the hazards and developing the controls. This is exactly what I'm looking for in a good IM/IRA. Let's use these principles in working towards what we both want in the document.

When will you do the ISM analysis? Is it later in the planning stages? How much can we do now and incorporate into the IM/IRA?

2. p2. Note filter plenum removal is decommissioning not deactivation.
We talked about the list of upcoming deactivation activities on p 2 and agree. Please provide a more detailed description of the activities in a manner which clearly explains their nature as deactivation. For example, removal of Raschig rings is deactivation but decon and removal of the tanks themselves is decommissioning. The brief descriptions need to be enhanced to clarify this.

3. Section 2.2, the RLC summary needs to be made quantitative, describing, at a moderate level, the degrees and extent of radiological contamination within the building. We would like to see a description of the areas containing contamination, (which gloveboxes, walls and or tanks for example) and the maximum levels and/or depths of contamination in the areas. What nuclides? Is the contamination deep or just surface? The decon techniques will depend upon this data. What is the holdup in the HVAC system? the various tanks? the piping? the equipment?

4. section 3.0 How many dollars per year do we save in decommissioning 886. (I don't believe I need this to approve the document but I think it would make your case to justify the action stronger.)

5. p.13, sec . 4.1: Is "reclaiming the site by recontouring and re-veg' part of the D&D project or ER? See the approach from 779. Same issue on p 27.

6. p.13, last par, the "commitments" on decon are really non-committal . What will cause the decontamination approaches to be modified as appropriate? Based on what criteria and considerations? Explain.

7. General: Section 4 has been improved greatly since we last talked. Good progress. It still needs some enhancement to get where were going base on the ISM process mentioned in #1. Here are some suggestions:

8. Table 4-2: reference table 4-6 which lists the areas to be contaminated

9. Work tasks in the decommissioning phase are still not well defined. List the major projects. A table like 4-6 would work well to do this. Activities such as tank removal from 103, removal of the GB in this area, removal of the split table, removal of the "experimental enclosure" in 101 would be an appropriate level of detail . Describe the levels of contamination and the issues and hazards for

each activity, particularly demonstrate your understanding of the radiological hazards of the operation.

10. p.16: Better define the piping systems which must be cut-out. What is the holdup?

11. p18: How many gloveboxes are to be removed? The description of the radiological hazards is inadequately detailed.

12. p. 19. Final surveys are briefly mentioned. The document needs much more detail on this. Perhaps in another section? Where?

13. Table 4-6 is a great start on defining the activities. What do the question marks mean? explain. Use this table to produce a list of the decommissioning activities.

14. Describe the methods to be used to remove gloveboxes.

15. Describe the methods to be used to remove the HVAC system while preventing any release of contamination.

16.. re p 27, sec 4.1.3.2. When will the demolition plan be prepared? Will it be submitted to CDPHE for review? Will there be any public involvement on its' content?

17. p 29, sec 5.0. This is my major area of concern and the section in need of most enhancement. After presenting the activities in sec 4, we need to carefully and in some moderate degree of detail describe the CONTROLS. Doesn't this belong here?? Per ISM thinking we need to see how the processes will be controlled and monitored to preclude any releases and determine if nay release to workers and the environment have occurred.

How can we construct an adequate text section on controls? Can we list controls for each project (per the table or list in section 4) or be more generic. We need to discuss contamination controls such as using tents around glovebox removals. Are controls needed on the tank and piping removals? What kinds? How will the spread of contamination be precluded when we remove the experimental area or the split table? We need to prepare a text section describing how contaminant releases will be prevented for the activities occurring during the project. How will workers be protected and monitored?

Monitoring needs to be described. Describe the types of monitoring which will be done during the project. the instruments used, the detectable levels, the minimum frequencies and , if not specific locations, , the criteria used to determine monitoring

18. The QA section, 9.0, needs additional information: Describe training requirements and assurance for management and workers. Describe methods used by management to ensure the quality of the work. Will inspections be performed by management? By whom? how often? How will they be documented? Who will review the inspection reports.

Will readiness evaluations be performed? by whom? Include a provision for CDPHE participation in the readiness reviews.

19. Section 10 is reserved for the project schedule. When will a schedule be prepared and included in the DOP?

20. Explain the rad protection organization for the project. I assume that rad ops and rad engineering will both be involved. Have procedures been developed which will provide for adequate communication and co-ordination between the two organizations? Which is in charge of determining

monitoring and or work control requirements for the project?

NOTE: the document has been provided to Chris Gilbreath of CDPHE to review the haz materials related sections. I have not looked at these sections carefully, and so you should expect additional comments from Chris on these areas.